

NEW YORK  
LONDON  
SINGAPORE  
PHILADELPHIA  
CHICAGO  
WASHINGTON, DC  
SAN FRANCISCO  
SILICON VALLEY  
SAN DIEGO  
LOS ANGELES  
TAIWAN  
BOSTON  
HOUSTON  
AUSTIN  
HANOI  
HO CHI MINH CITY

# Duane Morris®

FIRM and AFFILIATE OFFICES

ERIC R. BRESLIN  
DIRECT DIAL: +1 973 424 2063  
PERSONAL FAX: +1 973 556 1552  
E-MAIL: ERBreslin@duanemorris.com

www.duanemorris.com

SHANGHAI  
ATLANTA  
BALTIMORE  
WILMINGTON  
MIAMI  
BOCA RATON  
PITTSBURGH  
NEWARK  
LAS VEGAS  
CHERRY HILL  
LAKE TAHOE  
MYANMAR  
OMAN  
A GCC REPRESENTATIVE OFFICE  
OF DUANE MORRIS  
ALLIANCES IN MEXICO  
AND SRI LANKA

March 24, 2021

## VIA ECF

Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

*Sentencing of  
Vance Collins and Ramon  
Ramirez is adjourned  
from April 14 to  
May 12, 2021 at 11:00am.  
SO ORDERED  
[Signature]  
3-26-21*

**Re: United States v. Vance Collins and Ramon Ramirez, No. 19-cr-00395 (PKC)**

Dear Judge Castel:

We write on behalf of both Vance Collins and Ramon Ramirez. Both men are scheduled to be sentenced on April 14, 2021 at 11:00 AM. Due to ongoing difficulties resulting from the COVID-19 pandemic, we respectfully request that their sentencings be adjourned three weeks, to a date convenient to the Court after May 6, 2021. We also request that both Mr. Collins and Mr. Ramirez receive in-person sentencing hearings.

As previously communicated to the Court, it has been extremely difficult for counsel to meet with Mr. Collins since his move to Westchester County Department of Correction. Further, the pandemic has caused delays in locating and collecting necessary sentencing information for both men, and certain critical items remain outstanding. The additional time will permit the defense to adequately prepare for sentencing, and we do not anticipate seeking another adjournment.

Mr. Kluger joins this letter on behalf of Mr. Ramirez, and the government consents to the adjournment request.

We thank the Court for its consideration.

Duane Morris

Honorable P. Kevin Castel  
March 24, 2021  
Page 2

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

ERB:dc  
Cc: All Counsel of Record (Via ECF)